

Nowakowski, Sonja

From: microbialstardust@gmail.com
Sent: Friday, June 05, 2015 2:31 PM
To: Nowakowski, Sonja
Subject: Fw: Comments on ETIC net metering study
Attachments: ETICcomments_MaryFitz_2015-6-03.docx

Sonja, here are my comments from today. Thanks. Mary

Mary Fitzpatrick

From: alicia@northernplains.org
Sent: Friday, June 5, 2015 14:11
To: [Mary Fitzpatrick](#)

----- Forwarded message -----

From: "Alicia Pettys" <alicia@northernplains.org>
Date: Jun 5, 2015 11:04 AM
Subject: Comments on ETIC net metering study
To: "Mary Fitzpatrick" <stardust@usadig.com>
Cc:

Hi Mary,

Here are draft comments for you this afternoon. I'll print out a copy for you to submit to the committee -- good idea to read them from your tablet. See you around 2:00 pm!

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Alicia Pettys

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Northern Plains Resource Council is a grassroots conservation and family agriculture group. We organize Montana citizens to protect our water quality, family farms and ranches, and unique quality of life. **If you aren't a member, you should join!**

Energy & Telecommunications
Interim Committee 2015-16

Chairman and members of the committee:

Thank you for the opportunity to comment on the ETIC study of net metering. My name is Mary Fitzpatrick from Billings, and I am here today as a member of Northern Plains Resource Council. Northern Plains is a grassroots conservation organization whose mission is to protect Montana's family farms and ranches, water quality, and unique quality of life and we have close to 4,000 members across Montana.

IF NEEDED: We strongly encourage the committee to **pursue work-plan option A**, as that is the depth of study necessary to begin answering the questions that were raised about net metering during the legislative session. We encourage ETIC to focus its time and resources on determining the costs and benefits of net metering to the grid and other utility customers.

In regards to the **net metering questionnaire**, we'd like to agree with the comments from Mr. Rivas and MREA. The questionnaire should be focused on gathering facts about net metering, not the opinions of any of party, so that you can create an accurate and unbiased study of the costs and benefits of net metering. In particular, we ask you to remove the portion of questions # 1, 5, 7, and 23 that ask for the utilities and co-op's opinions. We also encourage you to look at all of the potential benefits of net metering, as outlined in MREA's comments.

The committee should also solicit responses from the Public Service Commission (PSC), because of the wealth of data and technical knowledge that they can provide. We believe the committee should also be willing to accept responses to the questionnaire from any interested organizations and the public.

Finally, Northern Plains would like to bring to the committee's attention that a realistic evaluation of the costs and benefits of net metering would **include consideration of a fully "integrated grid" approach**. An integrated grid is composed of a bulk delivery system (the current centralized utility business model) coupled with a Distributed Energy Resource (DER) system, made up of many distributed nodes of power generation and delivery that allow energy and information to move both ways.

As we see occurring in many other states nationwide, **grid upgrades must be made to create this fully integrated smart grid**. And the technology is now readily available to incorporate distributed renewable energy— including smart grid components like demand meters that inform customers of the real-time cost of energy and cost-effective home battery systems.

Regulatory changes are also being made in many states so that utilities can better integrate Distributed Energy Resources into their business model—whether time-of-use pricing, value of

solar calculations, or shifting the role of the utility to integrated grid manager rather than power supplier.

Right now, financial data is of course only available on the existing bulk delivery system, where utilities and co-ops' income is based on how much electricity they sell. That is the data you will be gathering through the net metering questionnaire. **However, ETIC should consider enlarging this policy space to enable a discussion on utility models that are based on an integrated grid system.** The state's role should be to provide the policy space for its citizens to benefit from advances in technology, not to prevent advances from occurring in order to protect the profits of a corporation over the benefits to other Montana stakeholders.

To that end, we encourage you to consider and address these two questions throughout this interim study of net metering:

- What regulatory changes are other states considering and/or implementing in order to integrate distributed energy resources?
- What are regulatory changes that would enable Montana's utilities to better integrate net metering, and distributed energy resources more broadly, into your operations?

Thank you once again for the opportunity to comment on the ETIC study of net metering.